State of California
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
LOS ANGELES REGION

CLEANUP AND ABATEMENT ORDER NO. 98-077

REQUIRING
LOS ANGELES UNIFIED SCHOOL DISTRICT
TO CLEANUP AND ABATE
CONDITIONS OF SOIL AND GROUNDWATER POLLUTION
AT
JEFFERSON NEW MIDDLE SCHOOL NO.1

(File No. 97-010)

The California Regional Water Quality Control Board, Los Angeles Region, finds:

1. The Jefferson New Middle School (JNMS) is located at 644 East 56th Street, Los Angeles, California. The site is bounded on the west by Avalon Boulevard, on the south by the Atchison, Topeka and Santa Fe (AT&SF) Railroad and Slauson Avenue, on the east by Paloma Avenue, and on the north by 56th Street.

2. The site was formerly occupied by a service station (5810 South Avalon Boulevard), a machine shop (637 East Slauson Avenue), and a furniture manufacturing facility with warehouses (5700 South Avalon Boulevard). All on-site commercial structures were demolished beginning in mid 1994 and the site was developed as the Jefferson New Middle School No. 1 educational facility by the Los Angeles Unified School District (LAUSD).

3. Nineteen underground storage tanks from the service station and from the light industrial facilities that occupied the property were removed, and soil contamination from fuels was remediated. All UST site remediation activities were conducted under the oversight of the Los Angeles City Fire Department (LACFD) and a no further action letter was issued by LACFD in October of 1996.

4. Following a request from the LACFD in late 1996, the Regional Board assumed responsibility for the site's groundwater and soil cleanup in March 1997. Solvent contamination from two of these underground storage tanks had contaminated both subsurface soils and groundwater. The Regional Board approved a remedial action plan to begin cleanup of solvent contaminated soils via a soil vapor extraction (SVE) system. A Permit to Operate this SVE system was issued by the South Coast Air Quality Management District in October of 1997.

5. Hexavalent chromium is also known to be present in the groundwater in the northwestern corner of the school and the source of this chromium is being determined. Records indicate chromium usage on this site. The highest groundwater contamination with hexavalent chromium was found beneath the school site. In

addition, a metal chrome platter, Hard Chrome Products Company, operated across 56th street for many years and has documented releases of chromium to soil and groundwater. Department of Toxic Substances Control (DTSC) is providing oversight for cleanup of the Hard Chrome Products site.

6. DTSC concluded, via their July 28, 1997 letter to the LAUSD, that there is no immediate threat to the health of students, employees, or the public attending the school from hazardous substances at the JNMS property. DTSC's previous evaluation did not address the volatile organic compounds (VOC) source area and was based on the LAUSD's screening risk calculations, and assumed that the majority of the vapors from the area impacted by VOC would be captured by the SVE system and would not be emitted into the air or accumulate inside building. On September 22, 1998, DTSC recommended that an additional risk assessment be conducted to determine if there is a possibility for exposure and health effects from this VOC source area, when the SVE system is not functional or operation is terminated. Currently, DTSC is evaluating the potential risk to students and teachers at the school from the VOC, underground storage tank source area, using the assumption that the SVE system will not be operating at all. DTSC has issued a letter on September 29, 1998, regarding the operation of the SVE system and requesting information regarding the backfill soil at this property.

7. The site is located on the Downey Plain, and is underlain by alluvial and marine sediments consisting of gravel, sand, silt, and clay that are part of the Central Groundwater Basin. Groundwater beneath the site is present in the Gaspur aquifer in the alluvium, the Exposition and Gage aquifers of the Lakewood Formation, and the Hollydale, Lynwood, Silverado, and Sunnyside aquifers of the San Pedro Formation. Groundwater is present approximately 150 feet below the ground surface. The site is located within Central Basin non-pressure area also known as Eckis Forebay Line and Recharge Area.

8. The Board adopted a revised Water Quality Control Plan for the Los Angeles Region on June 13, 1994. The Plan establishes water quality objectives to protect beneficial uses of groundwater in Central Basin, Coastal Plain Subunit. Groundwater in the Coastal Plain Subunit is beneficially used for municipal and domestic supply, agricultural supply, and industrial service and process supply.

9. This action is being taken for the protection of the environment and, as such, is exempt from the provisions of the California environmental Quality Act in accordance with California Code of Regulations, Title 14, Chapter 3, Section 15321.

IT IS HEREBY ORDERED, pursuant to Water Code Section 13304, that Los Angeles Unified School District shall comply with the following:

1. Continue operation of the SVE system, with any necessary modifications, required to assure that the system can operate continuously and in full compliance with all permitting agency requirements and in conformance with DTSC health

risk determinations. Additionally, re-evaluate the effectiveness of the SVE system. An evaluation and compliance report shall be submitted to this Regional Board according to the schedule in Attachment A.

2. In addition to SCAQMD required air sampling, conduct additional air sampling from the outlet of the second carbon canister of the SVE system and from the lowest enclosed area of each building. Samples shall be analyzed for VOC using EPA Method 8260 including TCE, methylene chloride and PCE in order to have data available to assess the potential for human health risk for the chemicals, if any, emitted from the stack or subsurface soil. A report of air sampling results with a human health risk evaluation shall be submitted to this Regional Board and the DTSC according to the schedule in Attachment A.

3. Submit all vapor extraction data in reports on a quarterly basis to Regional Board and DTSC. The report shall include a discussion of significant findings, human health risk evaluation, conclusions and recommendations.

4. Submit a source identification workplan for the hexavalent chromium discovered in the northwestern portion of the site. The source identification workplan shall be submitted to this Regional Board and DTSC according to the schedule in Attachment A. Staff plans to meet with the District early in October to assist in development of this workplan.

5. Evaluate the adequacy of its previous subsurface investigation for soil and groundwater and, based on this evaluation, prepare a subsurface investigation workplan in order to complete any necessary site assessment to fully define the nature and extent of the contamination. An evaluation report and subsurface investigation workplan shall be submitted to this Board for the Executive Officer's approval according to the schedule in Attachment A. Staff plans to meet with the District early in October to assist in development of this workplan.

6. Continue groundwater sampling on a quarterly basis and quarterly reporting along with the quarterly vapor extraction progress report. Upon completion of the groundwater investigation, Los Angeles Unified School District shall review currently available technologies and develop a remediation workplan for groundwater contamination, taking into account the comingled plume. This workplan is due to this Regional Board according to the schedule in Attachment A.

7. Quarterly progress reports detailing all activities implemented and the results obtained during the previous three-month period, as required by this Cleanup and Abatement Order, shall be submitted to this Board.

8. During any groundwater investigation, if contamination is found to be present in areas or zones not investigated in the subsurface investigation in item 5 above, a proposal and time schedule to remediate any such contamination shall be prepared

for the Executive Officer's approval. The proposal shall be submitted to this Board within sixty days after such contamination is identified.

9. The investigation and cleanup program shall be directed and conducted by a registered civil engineer or registered geologist or a certified engineering geologist.

10. This Order is not intended to stop or redirect any investigation or cleanup or remediation programs ordered by any other agency. Where any direction is received from any other agency that is believed by LAUSD to be in conflict with this Order, LAUSD is to advise the Board and the agency immediately.

11. This Order in no way limits the authority of the Board as contained in the California Water Code, to require additional investigation and cleanup pertinent to this project. This Order may be revised by the Executive Officer as additional information on this project becomes available.

12. Unless otherwise approved by the Executive Officer, failure to comply with the terms or conditions of this Order may result in imposition of civil liabilities either administratively by the Regional Board or judicially by the Superior Court in accordance with Section 13350, et. seq. of the California Water Code, and/or referral to the Attorney General of the State of California for such legal action as he or she may deem appropriate.

13. Section 13304 of the Porter-Cologne water Quality Act allows the Regional Board to recover reasonable expenses from responsible parties to oversee cleanup and abatement of unregulated discharges which have adversely affected waters of the State.

Hereby ordered on September 30, 1998.

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DENNIS A. DICKERSON
Executive Officer

ATTACHMENT A

CLEANUP AND ABATEMENT SCHEDULE

Activities	Date

SVE EVALUATION AND COMPLIANCE REPORT	October 9, 1998
AIR SAMPLING RESULTS WITH HUMAN HEALTH RISK EVALUATION	October 9, 1998
SOURCE IDENTIFICATION WORKPLAN FOR GROUNDWATER CONTAMINATION WITH HEXAVALENT CHROMIUM	October 30, 1998
SUBSURFACE EVALUATION REPORT AND INVESTIGATION WORKPLAN	October 30, 1998
SUBMIT GROUNDWATER REMEDIAL ACTION PLAN	Upon completion of site investigation
IMPLEMENT REMEDIAL ACTION PLAN	30 days after plan is approved by Executive Officer